

PRIVACY POLICY

Last updated 22 December, 2023

This Privacy Policy describes how Equip Financial Technology B.V. collects and uses your personal data that you provide in connection with products and services Equip provides (collectively referred to as the “Services”). This includes the Equip website at <https://withequip.com> and <https://platform.withequip.com>, and the Equip App when released, together the “Platform”. In this Privacy Policy, the above are referred to collectively as the “Services”. As a financial services company we have an important responsibility to protect the data you share with us and ensure your privacy is maintained. This policy describes the choices available to you regarding our use of your personal data. Services include software and services that we own and operate directly, as well as third-party software and services that we use in the Platform.

Who are we?

We are Equip Financial Technology B.V. (“we”, “our”, “us”) and operate under the name of Equip. We are committed to protecting and respecting your privacy. If you have any questions about your personal information or any other privacy related matters, please email us at support@withequip.com.

We are registered with the Dutch Chamber of Commerce (Kamer van Koophandel) under registration number 86747606. Our office address is Stadhouderskade 157-2, 1074 BC, Amsterdam. You can always email us at support@withequip.com and we will get back to you as soon as we can.

What information we may hold about you

Information your employer gives us

- Information passed to us from your employer such as your first and last name and email address.

Information you give us through the Platform and our Services:

- Information submitted through our Platform – for example, when you sign up to the Platform and provide details such as your first and last name, email address and employer, or details we collect about how you use the Platform;
- Information you give us through Equip’s communication channels;
- Information you exchange with your coach which is logged in notes, objectives or recommended actions as part of the Services;
- Information which is tied to your usage or settings on your device – for example, the mobile network you use, your IP address or operating system;
- Your financial data if you explicitly give consent to our partner Invers B.V. through your bank – see below (under *Additional information of financial data*) for additional information;
- Answers you give to surveys and/or other feedback about Equip and our Services;
- Recordings of your coaching session. To ensure that your Equip financial coach is complying with their obligations, we may carry out ongoing monitoring and compliance case checks which may involve a member of the Equip compliance team reviewing video recordings and/or written communications.

Additional information regarding your financial data

The Platform allows you to gain insight into your finances. To achieve this goal, the Platform analyzes and processes your financial bank transactions. For this purpose, we collaborate with Invers B.V.

Invers B.V. is licensed by De Nederlandsche Bank under the Payment Services Directive (PSD2). PSD2 mandates that a bank is obligated to grant access to your payment account to a third party, provided you give consent. In our case, it works as follows:

You use our Platform. In our Platform, we request your permission to retrieve your transactions. This process is facilitated through our partner, Invers B.V. You will be

directed to a consent screen from Invers B.V., where you log in through your own bank and grant permission.

Because you provide consent using your bank's login credentials within your bank's environment, your bank can verify that it is indeed you giving consent.

For an account information service, you grant permission for a period of 180 days. After that, we will request permission again. You can revoke your consent at any time; you do not need to wait for the full 180-day period.

Invers B.V. enriches your transaction data (e.g., with categories) your transactions and provides them to us. From the information we receive from Invers B.V., we process your bank balance and details of the transactions, including category, transaction number, date, time, and amount of your financial transaction.

In our Platform, we have various use cases with your transaction data, e.g., automated updates of your data, insights and recommendations across the different components of your financial life.

We obtain transaction data with the aim of providing insights into your finances. Examples of such insights include, but are not limited to, income and expenses, transactions to particular categories and up-to-date financial account balances. After at maximum of 5 years, we automatically delete this data. You always have the option to have us delete your data sooner. You can always email us at support@withequip.com with a request to do so.

If we inadvertently deduce sensitive personal data from certain categories, this is never our intention. We will never share these financial data based on transactions with other parties linked to you as an individual.

The privacy statement of our partner Invers B.V. can be found here:
<https://www.invers.nl/privacyverklaring>

Information we collect from your device

We may collect information to help improve our features and also to ensure we keep your data safe, this could include:

- Operating system and mobile network to analyse performance and bug issues;
- IP address and ID;
- Location to help protect you against fraud.

Information we collect or generate if you get in touch

If you contact Equip through any other way then the Platform, we collect the following information so we can best help you in a prompt manner:

- The phone number or email address you are reaching out to us on and the content of the conversation or email.

How we use this information

We understand that you are sharing personal information with us. We are committed to not taking more than we need as well as keeping safe what we do take. Any use of personal data is done in compliance with data laws such as the Algemene Verordening Gegevensbescherming (AVG). Our aim is to only collect data we need to enable us to best serve your needs. This may include enabling us to:

- Create and help manage your account;
- Provide our Services including financial guidance and coaching;
- Track, analyse and improve the services we provide you and other customers (our online Platform, coaching service and customer service);
- Prevent illegal activities like money-laundering and fraud;
- Market and communicate our products and Services and those of affiliated partners where we think these will be of interest to you. You can always unsubscribe from receiving these if you want to, by email via support@withequip.com and via the Platform;
- Confirm your identity when you sign up or get in touch;
- Investigate and resolve complaints and other issues;

- For training, monitoring and quality control and to ensure that the service we provide to you meets your needs and our standard of care.

Who will we share it with?

We may disclose your personal information to:

- Anyone who works for us, including but not limited to our Equip financial coaches
- Certain organisations that support our product, such as:
 - Amazon Web Services
 - Auth0
 - Calendly
 - Messagebird
 - Microsoft
 - Mixpanel
- Certain authorities to detect and prevent terrorism
- Anyone who you give us explicit permission to share it with or if we must disclose your personal data to comply with the law, or to enforce our Terms of Service or other agreements; or to protect the rights, property, or safety of us, our customers, or others.

We will never share any of your personal or identifiable information with your employer, nor will we share any of the content of your interaction with Equip.

We may share an aggregated overview of usage, user satisfaction and common themes that are shared across your organisation with your employer. For example, this could be a % of users that want to talk to their coach about the upcoming changes to the Dutch pension system. This would then indicate to your employer that additional guidance is needed to cover this topic. We will never share information that is either personal or personally identifiable with your employer.

We will always have an agreement in place with any third parties with whom we share your personal information. In all circumstances they will be obliged to keep your data safe and up to date and to delete it immediately upon our request.

Cookies

We use cookies, including individual identifiers, to improve the user experience within the Platform and we do not share any individually identifiable information with any third party, including your employer, unless you have given us explicit permission. These non-functional cookies include an account identifier cookie so we know who is logged in and a Google analytics cookie (which is used exclusively for Messagebird).

Your rights

Naturally, you are the owner, and have control, of your own data. Therefore, you have the following rights:

- **The Right to be Informed.** In other words, you have the right to know how your data is collected and used. This is what this Privacy Policy is for, but also you can always contact us to clear anything up.
- **The Right of Access.** You have the right to ask for, and receive, a copy of the personal data we hold about you.
- **The Right to Rectification.** Basically, if something is wrong, let us know and we will change it.
- **The Right to Erasure.** Simple - we will delete whatever you want us to delete.
- **The Right to Data Portability.** If you ever want to use the data that we hold for something else, then you can.
- **The Right to Object.** You are always able to object to any of the ways we handle your data. Just let us know.
- **The Right to File a Complaint.** Do you have a complaint about the processing of your personal data? Then we would like to discuss this with you. Under privacy legislation, you also have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) regarding incorrect processing of your personal data. For more information, you can contact the Dutch Data Protection Authority.

To exercise any of your rights or if you have any questions relating to any of the above, please contact us by reaching out to us via support@withequip.com

Similarly, you can withdraw your agreement to this privacy policy at any time by emailing support@withequip.com. If you do this, we'll be in touch as soon as possible, as we will need to close your account.

Our other obligations

Here's some other stuff that's important to us, and we think it's important you understand it too.

- We take the protection of your data seriously and implement appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized alteration.
- We won't share identifiable personal data with third parties for their direct marketing unless you have given us explicit permission.
- We will only keep your personal information for only as long as we need to. We'll then delete it securely and safely.
- There may be times when you give us sensitive information on your own accord, such as information on your life goals for which you require financial coaching and planning support. We'll only use this information in strict accordance with the law.

Where your data is stored

The data we collect from you may be transferred to and stored somewhere outside the European Economic Area ("EEA"). It may also be processed by staff outside the EEA who work for us or one of our suppliers. This isn't cause for concern - we always make sure that the adequate controls are in place to ensure your data is stored securely. As always, you can email support@withequip.com to understand more.

Third party websites

This Privacy Policy does not apply to third-party websites connected to this website through links. We cannot guarantee that these third parties handle your personal data in a reliable or secure manner. We recommend that you read the privacy statement of these websites before using them.

Changes to this policy

Any material changes we make to our Privacy Policy in the future will be posted on our website and, if we think you really should know about it, sent to you by email.